



Maine Transit Association
c/o Director Transportation and Waterfront
City of South Portland
46 O'Neil Street
South Portland, Maine 04106

August 1, 2011

Michelle Probert
MaineCare NEMT Director
Department of Health and Human Services
221 State Street
Augusta, ME 04330

Re: MaineCare Non-Emergency Medical Transportation System Redesign
August 1, 2011 Stakeholders Forum

Dear Ms. Probert:

The Maine Transit Association (MTA) is pleased to participate in the Stakeholders Forum on the MaineCare Non-Emergency Medical Transportation (NEMT) System Redesign. The Maine Transit Association is the voice of Maine's public transportation community. We provide mobility for Maine people statewide.

Enclosed are our recommendations for the forthcoming RFP for the new NEMT system. We are pleased that DHHS has decided to implement a system of regional brokers. These recommendations will both assure the highest quality of service to MaineCare members and provide for a fair and equitable bid process.

Thank you for your consideration.

Sincerely,


Tom Meyers
President, Maine Transit Association

Cc: Commissioner Mary Mayhew, DDHHS



Non Emergency Medical Transportation (NEMT) System Redesign

Recommendations from the Maine Transit Association

August 1, 2011

The Maine Transit Association (MTA) believes the current regional transportation system in Maine is strong. The regional providers have honed the system with over 30 years of work in partnership with Maine DOT, DHHS, and DOL. The network of regional transportation agencies currently provides safe and efficient transportation to residents in every corner of the state. To preserve the best of that system, the NEMT RFP should address the following points:

1. Regions

- The RFP should be issued such that regional brokers will conform geographically to the eight (8) regions established pursuant to Title 23 §4209. (All reference to "regions" here is to Maine DOT's eight (8) geographic regions.)
- Bidders should be permitted to apply for only one (1) region. If it is determined that restricting bidders to a single region is not in the best interest of the State, bidders should be restricted to a maximum of two (2) contiguous regions to ensure the highest quality of service, provide the least disruption of service to members, and capitalize on local knowledge, geographic proximity and personal connection.
- The RFP's scoring should provide a preference to bidders with a physical presence in the region for which they are bidding. Operation of only a call center within the region does not meet that requirement.

2. Volunteer Drivers

- The broker should be required to work through the current regional providers to utilize volunteers as part of their service network. Volunteer drivers are an integral part of the book of business of the regional providers and are as important to their agency as are agency vehicles and paid drivers. In addition, there are inherent benefits to placing volunteer operations within non-profit organizations, including tax treatment of volunteers not available to for-profit companies (where they are utilized as paid contractors), which is a benefit to recruitment and retention.

3. Financial Requirements

- Any financial requirements for cash reserves for the brokers should not be so excessive and/or burdensome that they eliminate non-profit organizations from consideration. The Commonwealth of Kentucky regional brokerage RFP is a good model.
- Provisions for mid-contract rate adjustment should be incorporated into the agreements between MaineCare and the brokers. Adjustments should be based on actual cost of service provision

versus established PMPM rate(s). MaineCare should consider having multiple rates, broken out by urban / rural, based on trip length, or on identified special needs populations. (Refer to Missouri HealthNet NEMT Review, Final Report, which can be found at http://www.lewin.com/content/publications/MOHealthNet_NEMT2010finalrpt.pdf)

4. Transportation Providers

- The brokers must be required to engage with established transportation providers to ensure quality service. Established transportation providers assure that services are provided in a safe, timely, and reliable manner. They already comply with state and federal regulatory requirements and meet consumer satisfaction criteria approved by the Commissioner of the Department of Health and Human Services.
- The RFP should establish minimum standards for transportation providers, including that they have been in business for at least five (5) consecutive years and have a proven record of performance serving the public.

5. Performance Measures

- DHHS should focus on proven and effective quality and service benchmarks that are important to Maine's rural and small urban populations. These benchmarks include:
 - Effectiveness - number of trips per vehicle hour, percentage of trips by mode of transport
 - Efficiency – cost per trip, number of piggyback trips
 - Quality – on-time performance, safety record, rider satisfaction.
- In selecting quality benchmarks, the RFP should ensure that they are rational and appropriate for Maine's rural and small urban operating environment. Benchmarks such as call center abandonment rate, requiring software that can calculate mileage, or mandating a member's signature on every trip manifest, can add unnecessary costs without improving service.

6. Treatment of Special Populations

- The RFP should establish a capitated rate focused only on the general NEMT population. The capitated rate is a key component of any brokerage model.
- Different capitated rates should be established for special populations with high utilization rates. Even a small number of extremely high cost clients, such as those receiving dialysis, adults with mental retardation attending day programs, or out-of-state travel for critical care services, have an extraordinarily high, negative financial impact on service delivery. Other states are currently utilizing different rates for special populations. (See Missouri HealthNet Final Report which can be found at http://www.lewin.com/content/publications/MOHealthNet_NEMT2010finalrpt.pdf)

Maine Transit Association Points of Contact

For more information **contact the transportation provider in your region, or:**

Connie Garber - York County Community Action Corporation
(207) 459-2930 or e-mail cgarber@yccac.org

Jim Wood - Kennebec Valley Community Action Program
(207) 859-1564 or e-mail jimw@kvcap.org

Tom Meyers - South Portland Bus Service
(207) 767-5556 or e-mail tmeyers@southportland.org